# **EXHIBIT D**

#### Comerica Incorporated's Infringement of U.S. Patent No. 6,091,956

Pursuant to P.R. 3-6 (a)(1), Plaintiff LBS Innovations LLC ("LBSI") hereby submits Amended Infringement Contentions based on the Court's Claim Construction Order (Dkt. 195). Accordingly, this document shows how Comerica Incorporated ("Comerica") infringes Claim 11 of United States Patent No. 6,091,956 ("the '956 Patent").

Comerica directly infringes Claim 11 of the '956 Patent when its employees, agents or representatives test the Comerica website, including the Comerica Branch/ATM Locator, <a href="http://campaign.comerica.com/local?search=&type=All&.x=37&.y=13">http://campaign.comerica.com/local?search=&type=All&.x=37&.y=13</a>, in connection with making it available to the general public. In so doing, Comerica has performed the claimed steps as described in Exhibit A involving the same "computer." The Comerica Branch/ATM Locator also directly infringes the '956 Patent under the Doctrine of Equivalents as shown in Exhibit A.

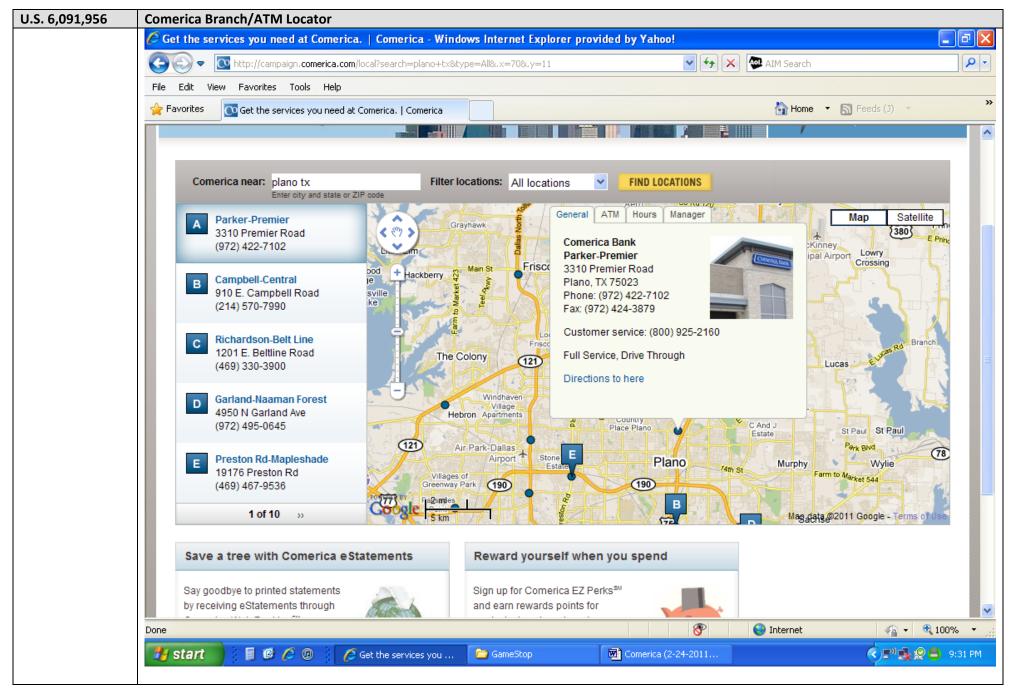
Alternatively, Comerica indirectly infringes Claim 11 of the '956 Patent by inducing users to visit its website and utilize the Comerica Branch/ATM Locator as shown in Exhibits B and C.

Comerica also provides a software application, the "Comerica Mobile Banking," for mobile communication devices which provides a mobile Branch/ATM Locator with, presumably, substantially similar functionality to the Comerica Branch/ATM Locator website. LBSI expects to supplement its infringement contentions with respect to the Comerica Mobile Banking application once discovery has been obtained.

These charts are preliminary, and LBS Innovations LLC ("LBSI") expects to supplement these charts once discovery has been obtained from Comerica, confirming that Comerica infringes Claim 11 as set forth in these infringement contentions.

## Comerica Incorporated Infringes U.S. Patent No. 6,091,956 Exhibit A

U.S. 6,091,956	Comerica Branch/ATM Locator
11. A method of	Pursuant to the Court's Claim Construction Order, the preamble, including "making apparent to the aural and tactile senses of the user," is not
communicatively	a limitation.
executing,	
including making	Comerica Incorporated ("Comerica") has performed the steps of this claim by testing its website in connection with making it available to the
apparent to the	general public. In so doing, Comerica Branch/ATM Locator directly infringes Claim 11 by communicating transmittable hypertext items
aural and tactile	representing objects (e.g., Banking Centers, 24-hour ATMs, and Drive-throughs). The locations are shown on scaled maps that show the
senses of the	relative position of these locations with respect to a location specified by the user. See, e.g., the following screenshot showing various
user, one or more	mapped locations. These steps are performed by Comerica involving the same "computer."
transmittable	
mappable	
hypertext items	
representing	
people,	
organisms, and	
objects, including	
buildings, roads,	
vehicles, and	
signs, on a	
computer in a	
manner scalably	
representing	
interrelationships	
of said objects,	
comprising the	
steps of:	



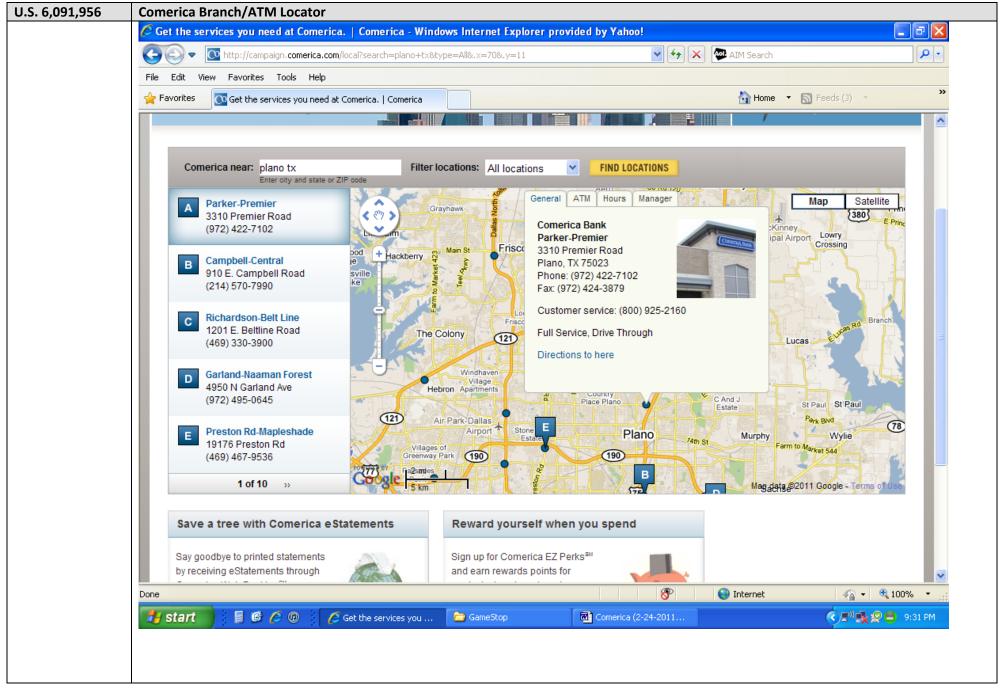
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U.S. 6,091,956	Comerica Branch/ATM Locator
a. searching each	The Comerica Branch/ATM Locator satisfies step (a) by performing the step of "searching each of one or more unique mappable information
of one or more	code sequences, each of which said code sequences serving to uniquely represent one of said items and copied from the memory of said
unique mappable	computer or received from an alternate source, for a field containing geographical coordinates, said each of said code sequences includes an
information code	item reference field, a name field, a location field including said geographical coordinates, and a data field."
sequences, each	
of which said	During Comerica's testing of the Comerica Branch/ATM Locator, a Comerica employee, agent or representative user enters a search criteria
code sequences	(e.g., a city and state or a zip code, and optionally a type of location) and clicks the "FIND LOCATIONS" button, a database of unique mappable
serving to	information code sequences is searched based on the user-entered search criteria. The user-entered search criteria in this example are
uniquely	Comerica locations near "Plano TX". Each entry in this database of locations is a unique mappable information code sequence because each
represent one of	entry contains information about the Comerica location to which it corresponds, including geographical coordinates, which allows the
said items and	Comerica location to be shown on the map. LBSI believes the Comerica Branch/ATM Locator searches a database of unique mappable
copied from the	information code sequences corresponding to Comerica locations for at least the following reasons:
memory of said	
computer or	The publicly-available code for the Comerica Branch/ATM Locator shows that it contains a number of elements that are populated with
received from an	information about particular Comerica locations. An example entry from the map for one of the Comerica locations identified in the map
alternate source,	above is excerpted below:
for a field	
containing	Comerica Bank\u003cbr\u002f\u003eParker-Premier \u003c\u002fdiv\u003e\u000a
geographical	\u003cdiv class=\u0022address\u0022\u003cdiv class=\u0022location
coordinates, said	vcard\u0022\u003e\u003cdiv class=\u0022adr\u0022\u003e\u000a\u003cspan
each of said code	class=\u0022fn\u0022\u003e\u003c\u002fspan\u003e\u000a\u003cdiv class=\u0022street- address\u0022\u003e3310 Premier Road\u003c\u002fdiv\u003e\u000a\u003cspan
sequences	class=\u0022locality\u0022\u003ePlano\u003c\u003fspan\u003e, \u003cspan
includes an item	class=\u0022region\u0022\u003eTX\u003c\u002fspan\u003e \u003cspan class=\u0022postal-
reference field, a	code\u0022\u003e75023\u003c\u002fspan\u003e\u003cdiv class=\u0022country-name\u0022\u003eUnited
name field, a	States\u003c\u003c\u003e\u003e\u003cspan class=\u0022geo\u0022\u003e\u003cabbr
location field	class=\u0022latitude\u0022 title=\u002233.041067\u0022\u003e33° 2\u0027 27.8412\u0022 N\u003c\u002fabbr\u003e, \u003cabbr class=\u0022longitude\u0022 title=\u0022-
including said	96.706963\u0022\u003e96° 42\u0027 25.0668\u0022
geographical	W\u003c\u002fabbr\u003e\u003c\u002fspan\u003e\u000a\u003c\u002fdiv\u003e\u000a\u003cdiv
coordinates, and	class=\u0022map-link\u0022\u003e\u000a
a data field,	\u003c\u003c\u003e\u000a\u003c\u002fdiv\u003e\u000a\u003c\u003c\u003e\u000a
	\u003cdiv class=\u0022phone\u0022\u003e\u000a \u003cspan\u003ePhone:\u003c\u002fspan\u003e\u000a (972) 422-7102
	\u003c
	class=\u0022fax\u0022\u003e\u000a \u003cspan\u003eFax:\u003c\u003e\u003e\u000a
	(972) 424-3879 \u003c\u003c\u003e\u0003e\u000a \u003cdiv
	class=\u0022customer-service\u0022\u003e\u000a \u003cspan\u003eCustomer
	service:\u003c\u002fspan\u003e\u000a (800) 925-2160 \u003c\u002fdiv\u003e\u000a
	\u003cdiv class=\u0022branch-type\u0022\u003eFull Service, Drive

U.S. 6,091,956	Comerica Branch/ATM Locator
	Through\u003c\u003c\u003e\u0003e\u000a \u003cdiv class=\u0022gmap-directions\u0022\u0003e\u000a
	\u003ca
	href=\u0022http:\u002f\u002fmaps.google.com\u002fmaps?daddr=3310%20Premier%20Road%2C%20Plano%2C%2
	OTX%2C%2075023\u0022 target=\u0022_blank\u0022\u003eDirections to here\u003c\u002fa\u003e\u000a
	\u003c\u002fdiv\u003e\u000a \u003cdiv class=\u0022gmap-streetview\u0022\u003e\u000a
	\u003ca href=\u0022javascript:void(0);\u0022\u003eStreet view\u003c\u003e\u003e\u003a
	\u003c\u002fdiv\u003e\u000a \u003c\u002fdiv\u003e\u000a \u003cdiv
	id=\u0022atm\u0022\u003e\u000a \u003cdiv class=\u0022atm-
	functionality\u0022\u003e\u000a \u003cstrong\u003eATM
	Functionality:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u003e\u000a Full Service Drive-Up
	\u003c\u002fdiv\u003e\u000a \u003cdiv class=\u0022atm-
	availability\u0022\u0003e\u0000a \u003cstrong\u003eATM
	Availability:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u003e\u000a 24 hours a day 7 days a
	week \u003c\u003c\u003e\u000a \u003cdiv class=\u0022atm-
	location-type\u0022\u003e\u000a \u003cstrong\u003eLocation
	Type:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u000a Branch
	\u003c\u002fdiv\u003e\u000a \u003c\u002fdiv\u003e\u000a \u003cdiv
	id=\u0022hours\u0022\u003e\u000a \u003cdiv class=\u0022branch-
	hours\u0022\u003e\u000a \u003cstrong\u003eBanking Center
	Hours:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u000a M-TH 9:00 - 4:00, F 9:00 -
	6:00, SA 9:00 - 12:00 \u003c\u002fdiv\u003e\u000a \u003cdiv
	class=\u0022drivein-hours\u0022\u003e\u000a \u003cstrong\u003eDrive-in
	Hours:\u003c\u003c\u003e\u003cbr\u003cbr\u003e\u003e\u0003
	\u003c\u003c\u003e\u003e\u000a \u003c\u003c\u003e\u000a \u003cdiv
	id=\u0022manager\u0022\u003e\u000a \u003cdiv class=\u0022manager-
	name\u0022\u003e\u000a
	\u003cstrong\u003eManager:\u003c\u003e\u00
	Toombs \u003c\u003c\u003e\u003e\u000a \u003cdiv class=\u0022manager-
	phone\u0022\u003e\u000a \u003cstrong\u003eManager
	Phone:\u003c\u003c\u003e\u003cbr\u003cbr\u003e\u000
	\u003c\u003c\u003e\u000a \u003c\u002fdiv\u003e\u000a
	\u003c\u002fdiv\u003e\u000a
	\u003c\u002fdiv\u003e\u000a\u003c\u003c\u003c\u003c\u003c\u003fdiv\u003e", "opts": { "title":
	"", "highlight": 0, "highlightcolor": "#FF0000" }, "nid": "1002" }, { "latitude": 32.974706,
	"longitude": -96.709304, "markername": "comerica", "offset": 1,
	This example shows that a database entry for a location contains, "an item reference field, a name field, a location field including said
	geographical coordinates, and a data field." The following list identifies exemplars for each of these fields:
	<ul> <li>An item reference field: Presumably, each location includes an identifier, e.g., a database record number, a location number, etc.         Each location also includes a unique value for the variable "nid", e.g., for the Parker-Premier location "nid=1002"     </li> <li>A name field: Parker-Premier</li> </ul>

U.S. 6,091,956	Comerica Branch/ATM Locator
	<ul> <li>A location field including said geographical coordinates: class=\u0022latitude\u0022 title=\u002233.041067\u0022\u003e33° 2\u0027 27.8412\u0022 N\u003c\u002fabbr\u003e, \u003cabbr class=\u0022longitude\u0022 title=\u0022-96.706963\u0022\u003e96° 42\u0027 25.0668\u0022</li> <li>A data field: e.g., address, phone number, ATM functionality/availability, location hours, manager</li> <li>The Comerica Branch/ATM Locator presumably runs a search by comparing the user-entered search criteria to geographical locations of Comerica locations in a database to identify the Comerica locations geographically closest to the user-entered search criteria.</li> </ul>
	During Comerica testing of the Comerica Branch/ATM Locator, this step is performed involving the same "computer" involved in performing the other steps of this claim.
b. converting said coordinates to an appropriately	The Comerica Branch/ATM Locator satisfies step (b) by performing the step of "converting said coordinates to an appropriately proportionate representation on said computer."
proportionate representation on said computer, and	During Comerica testing of the Comerica Branch/ATM Locator, the Comerica Branch/ATM Locator returns a map according to a predetermined zoom level involving the same "computer" performing the other steps of this claim. The Comerica Branch/ATM Locator also returns a map according to a predetermined size. For example, the exemplary code below defines the map zoom level and size:  { "autolmap": { "width": "100%", "height": "450px", "zoom": 4, "maxzoom": "14",
	Based on the layout of the Comerica Branch/ATM Locator, the zoom level and size each provide for the display of an appropriately proportionate representation.
c. displaying selectably scalably said items on said computer whereby said user may quickly	The Comerica Branch/ATM Locator satisfies step (c) by performing the step of "displaying selectably scalably said items on said computer whereby said user may quickly receive and display timely situation information mapped in the context of spatial information, including appropriate to a geographical or other area, in which said mappable hypertext items are quickly received, mapped, and optionally executably selected by said user to provide additional of said situation information or received, stored, and transmitted by a provider of said situation information."
receive and display timely situation information mapped in the context of spatial	During Comerica testing of the Comerica Branch/ATM Locator, the Comerica Branch/ATM Locator causes the mappable hypertext items that are displayed on a map to appear based on the user-entered search criteria involving the same computer that performs steps (a) and (b) above. The scale (or zoom) of the map is initialized to a predetermined value, but a different scale map be selected by the user. For example, a different scale may be performed by selecting the "+" or "-" symbols displayed on the left side of the map. Selecting the "+" symbol results in zooming in on the displayed map, whereas selecting the "-" symbol results in zooming out of the displayed map.
information,	The map image displays hypertext items corresponding to the user-entered search criteria. Information displayed about places or locations

U.S. 6,091,956	Comerica Branch/ATM Locator
including appropriate to a geographical or other area, in which said mappable hypertext items are quickly received, mapped, and optionally executably selected by said user to provide additional of said situation information or received, stored, and transmitted by a provider of said situation information.	based upon the user-entered search criteria constitutes timely situation information, including an event, or condition, occurring or about to occur at the places or locations, such as address and contact information, the kind of services currently available at any particular location (e.g., "Full Service," "Drive Through"), an image of the places (e.g. branch location), and the option to provide directions to the selected location. The locations are geographically relevant (e.g., closest in distance amongst all of the locations) to the user-entered search criteria. Further, each of the locations is displayed on a map, and are thus, "mapped in the context of spatial information, including appropriate to a geographical or other area."  The mappable hyptertext items, e.g., the markers representing the locations, are received, mapped and optionally executable to provide additional situation information. The markers are received and displayed on the map according to the coordinates associated with each location. Each marker may also be "optionally executable," when the different tabs such as "ATM", "Hours", and "Manager" are clicked, providing additional situation information (e.g., address, phone number, location type, directions, ATM functionality, ATM availability, location hours, drive-through hours, manager name and phone number, etc.). Accordingly, the "additional situation information" is the information displayed in response to clicking tabs or links associated with a given marker.

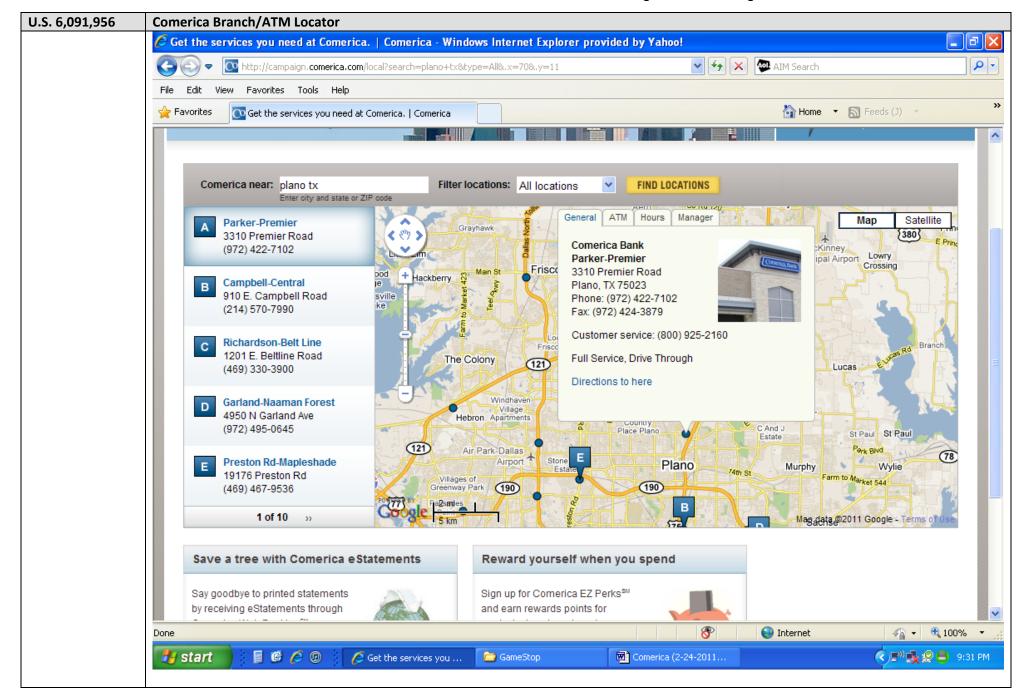


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U.S. 6,091,956	Comerica Branch/ATM Locator
	The above steps are also performed when the Comerica Branch/ATM Locator communicatively executes transmittable hypertext items to end users under the Doctrine of Equivalence. In particular, the Comerica Branch/ATM Locator infringes step (c) under the doctrine of equivalents, because the Comerica Branch/ATM Locator performs substantially the same function in substantially the same way to achieve substantially the same results and any alleged differences between the Comerica Branch/ATM Locator and step (c) are insubstantial.
	Under the Court's construction of "said computer," "displayingon said computer" requires the computer which performed steps (a) and (b) of Claim 11 to cause the mappable hypertext items to appear on the same computer. While the Comerica Branch/ATM Locator literally performs steps (a) and (b) and the step of "displaying" as construed by the Court (i.e., the Comerica Branch/ATM Locator "displays" the mappable hypertext items by causing them to appear), the Comerica Branch/ATM Locator may not cause the items to appear on the same computer (e.g., Comerica's own computer); the items are caused to appear on a different computer (e.g., a user's computer). However, causing the items to appear on the same computer or a different computer is an insubstantial difference, and the Comerica Branch/ATM Locator infringes element (c) under the doctrine of equivalents by performing substantially the same function in substantially the same way to achieve substantially the same result as follows:
	Function: The function of element (c) is recited in the claim: "display timely situation information mapped in the context of spatial information." The Comerica Branch/ATM Locator performs this function by causing Branch/ATM locations which are relevant to the user-entered search criteria to appear.  Way: The way the Comerica Branch/ATM Locator performs this function is by preparing instructions (e.g., computer code) for causing certain Branch/ATM locations to appear on the computer. The instructions are transmitted to a computer with a program (e.g., a browser) that can interpret the instructions.  Result: The result of element (c) is that the items are displayed on a computer. For example, the program (e.g., a browser) interprets the instructions to display the items. Under the Court's construction of "said computer," the same computer that prepared the instructions also includes the browser for displaying the items. However, it is a substantially the same result to have the instructions communicated to a second computer which includes a program (e.g., a browser) that interprets the instructions to display the items. The instructions do not need to be modified in any way for display by the program on the second computer, because the programs must operate similarly to ensure that the items are displayed as intended. The only difference would be to establish a communication link between the computer and the second computer, to allow the computer to transmit the instructions to the second computer.

## Comerica Incorporated Branch/ATM Locator Infringes U.S. Patent No. 6,091,956 Exhibit B

U.S. 6,091,956	Comerica Branch/ATM Locator
11. A method of	Pursuant to the Court's Construction Order, the preamble, including "making apparent to the aural and tactile senses of the user," is not a
communicatively	limitation.
executing,	
including making	Comerica induces infringement of Claim 11 by causing a user's computer, and in particular, an Internet browser on the user's computer, to
apparent to the	communicate transmittable hypertext items representing objects (e.g., places or Banking Centers, 24-hour ATMs, and Drive-throughs) which
aural and tactile	are received from the Comerica Branch/ATM Locator. The places or locations are shown on scaled maps that show the relative position of
senses of the	these locations with respect to a location specified by the user. See, e.g., the following screenshot showing various mapped locations.
user, one or more	
transmittable	
mappable	
hypertext items	
representing	
people,	
organisms, and	
objects, including	
buildings, roads,	
vehicles, and	
signs, on a	
computer in a	
manner scalably	
representing	
interrelationships	
of said objects,	
comprising the	
steps of:	
I	



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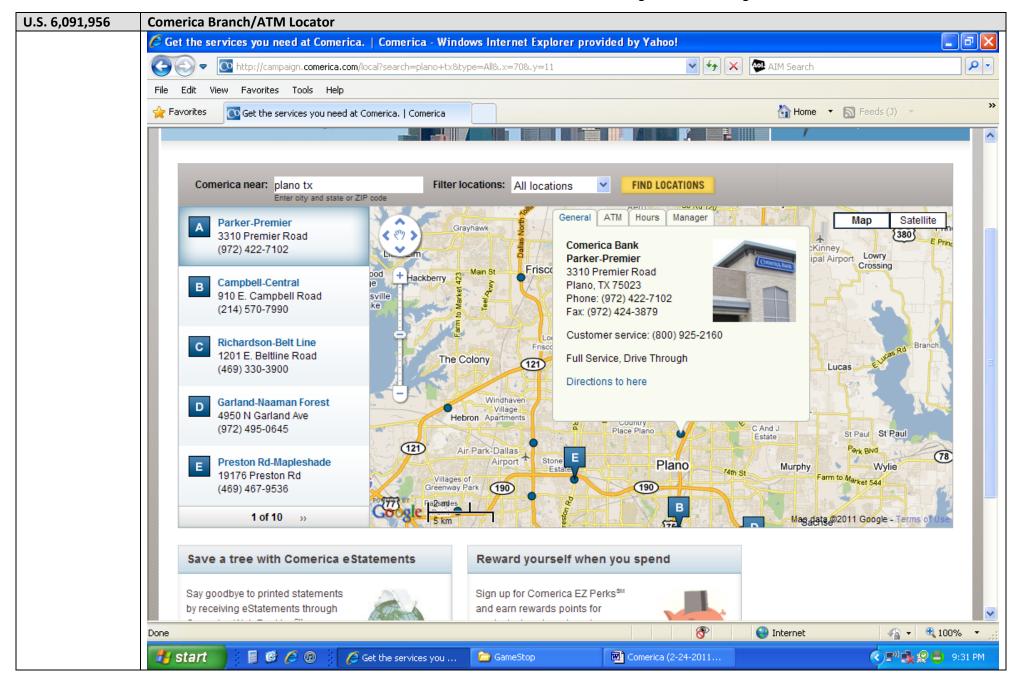
#### U.S. 6,091,956 Comerica Branch/ATM Locator Comerica induces a user visiting the Comerica Locator using a "computer" to perform the step of "searching each of one or more unique a. searching each of one or more mappable information code sequences, each of which said code sequences serving to uniquely represent one of said items and copied from unique mappable the memory of said computer or received from an alternate source, for a field containing geographical coordinates, said each of said code information code sequences includes an item reference field, a name field, a location field including said geographical coordinates, and a data field." sequences, each When the user enters search criteria (e.g., a city and state or a zip code, and optionally a type of location) and clicks the "FIND LOCATIONS" of which said code sequences button, the user's computer causes a search of a database of unique mappable information code sequences for a field containing geographical serving to coordinates. By requiring that the user-entered search criteria include geographical information (e.g., city/state or zip code), the search uniquely caused to be performed by the user's computer is limited to a search for geographical coordinates. The user-entered search criteria in this represent one of example are all Comerica locations near "Plano TX", which the user's computer uses to construct a query string: said items and http://campaign.comerica.com/local?search=plano+tx&type=All&x=70&y=11. The user's computer sends the query string is sent to a copied from the Comerica computer (e.g., a server) which parses the query string to identify the search parameters – "plano" "tx" and "all" locations. The memory of said computer or Comerica computer compares the search parameters to Comerica Branch/ATM location entries in a database. Each entry in this database of received from an locations is a unique mappable information code sequence, because each entry contains information, including geographical coordinates, alternate source, about the Comerica location to which it corresponds. for a field containing The publicly-available code for the Comerica Branch/ATM Locator shows that it contains a number of elements that are populated with geographical information about particular Comerica locations. An example entry from the map for one of the Comerica locations identified in the map coordinates, said above is excerpted below. each of said code sequences Comerica Bank\u003cbr\u002f\u003eParker-Premier \u003c\u002fdiv\u003e\u000a \u003cdiv class=\u0022address\u0022\u003e\u003cdiv class=\u0022location includes an item vcard\u0022\u003e\u003cdiv class=\u0022adr\u0022\u003e\u000a\u003cspan reference field, a class=\u0022fn\u0022\u003e\u003c\u002fspan\u003e\u000a\u003cdiv class=\u0022streetname field, a address\u0022\u003e3310 Premier Road\u003c\u002fdiv\u003e\u000a\u003cspan location field class=\u0022locality\u0022\u003ePlano\u003c\u002fspan\u003e, \u003cspan including said class=\u0022region\u0022\u003eTX\u003c\u002fspan\u003e \u003cspan class=\u0022postalgeographical code\u0022\u003e75023\u003c\u002fspan\u003e\u003cdiv class=\u0022country-name\u0022\u003eUnited States\u003c\u002fdiv\u003e\u000a\u003cspan class=\u0022qeo\u0022\u003e\u003cabbr coordinates, and class=\u0022latitude\u0022 title=\u002233.041067\u0022\u003e33° 2\u0027 27.8412\u0022 a data field, N\u003c\u002fabbr\u003e, \u003cabbr class=\u0022longitude\u0022 title=\u0022-96.706963\u0022\u003e96° 42\u0027 25.0668\u0022 W\u003c\u003fabbr\u003e\u003c\u002fspan\u003e\u000a\u0003c\u002fdiv\u003e\u0003cdiv class=\u0022map-link\u0022\u003e\u000a \u003c\u002fdiv\u003e\u000a\u003c\u003c\u003e\u000a\u0003c\u002fdiv\u003e\u000a \u003cdiv class=\u0022phone\u0022\u003e\u000a \u003cspan\u003ePhone:\u003c\u002fspan\u003e\u000a (972) 422-7102 \u003c\u002fdiv\u003e\u000a \u003cdiv

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U.S. 6,091,956	Comerica Branch/ATM Locator
	class=\u0022fax\u0022\u003e\u000a \u003cspan\u003eFax:\u003c\u003c\u003e\u0003e\u000a
	(972) 424-3879 \u003c\u002fdiv\u003e\u000a \u003cdiv
	class=\u0022customer-service\u0022\u003e\u000a \u003cspan\u003eCustomer \
	service:\u003c\u002fspan\u003e\u000a (800) 925-2160 \u003c\u002fdiv\u003e\u000a
	\u003cdiv class=\u0022branch-type\u0022\u003eFull Service, Drive
	Through\u003c\u002fdiv\u003e\u000a \u003cdiv class=\u0022gmap-directions\u0022\u003e\u000a \u003ca
	href=\u0022http:\u002f\u002fmaps.google.com\u002fmaps?daddr=3310%20Premier%20Road%2C%20Plano%2C%2
	0TX%2C%2075023\u0022 target=\u0022_blank\u0022\u003eDirections to here\u003c\u003e\u003e\u000a
	\u003c\u002fdiv\u003e\u000a \u003cdiv class=\u0022gmap-streetview\u0022\u003e\u000a
	\u003ca href=\u0022javascript:void(0);\u0022\u003eStreet view\u003c\u003e\u003e\u000a
	\u003c\u002fdiv\u003e\u000a \u003c\u002fdiv\u003e\u000a \u003cdiv
	id=\u0022atm\u0022\u003e\u000a \u003cdiv class=\u0022atm-
	functionality\u0022\u003e\u000a \u003cstrong\u003eATM
	Functionality:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u003e\u000a Full Service Drive-Up
	\u003c\u002fdiv\u003e\u000a \u003cdiv class=\u0022atm-
	availability\u0022\u0003e\u000a \u003cstrong\u003eATM
	Availability:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u003e\u000a 24 hours a day 7 days a
	week \u003c\u003c\u003e\u0003e\u000a \u003cdiv class=\u0022atm-
	location-type\u0022\u003e\u000a \u003cstrong\u003eLocation
	Type:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u000a Branch
	\u003c\u002fdiv\u003e\u000a \u003c\u002fdiv\u003e\u000a \u003cdiv
	id=\u0022hours\u0022\u003e\u000a \u003cdiv class=\u0022branch-
	hours\u0022\u003e\u000a \u003cstrong\u003eBanking Center
	Hours:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u000a M-TH 9:00 - 4:00, F 9:00 - 6:00, SA 9:00 - 12:00 \u003c\u002fdiv\u003e\u0003e\u000a \u003cdiv
	class=\u0022drivein-hours\u0022\u003e\u000a \u003cstrong\u003eDrive-in
	Hours:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u0003e\u000a
	\u003c\u002fdiv\u003e\u000a \u003c\u002fdiv\u003e\u000a \u003cdiv
	id=\u0022manager\u0022\u003e\u000a \u003cdiv class=\u0022manager-
	name\u0022\u003e\u000a
	\u003cstrong\u003eManager:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u000a
	Toombs \u003c\u002fdiv\u003e\u000a \u003cdiv class=\u0022manager-
	phone\u0022\u003e\u000a \u003cstrong\u003eManager
	Phone:\u003c\u003c\u003e\u003cbr\u003c\u003e\u00
	\u003c\u002fdiv\u003e\u000a \u003c\u003c\u003e\u0003e\u000a
	\u003c\u002fdiv\u003e\u000a \u003c\u002fdiv\u003e\u000a
	\u003c\u002fdiv\u003e\u000a\u003c\u003c\u003e\u0003e\u000a\u003c\u003c\u003fdiv\u003e", "opts": { "title":
	"", "highlight": 0, "highlightcolor": "#FF0000" }, "nid": "1002" }, { "latitude": 32.974706,
	"", "fightight": 0, "fightightcolor": "#FF0000" }, "fid": "1002" }, { "latitude": 32.974706,
	TOTIGITUDE • -30.703304, "MarkerHame"• "Comerica", "OffSet"• 1,

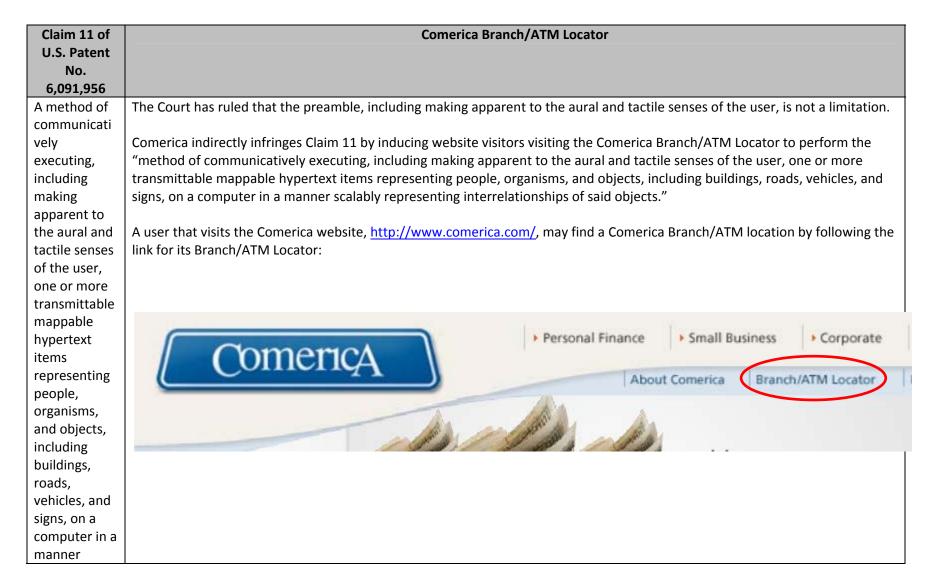
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	This example shows that a database entry for a location contains, "an item reference field, a name field, a location field including said geographical coordinates, and a data field." The following list identifies exemplars for each of these fields:
	<ul> <li>An item reference field: Presumably, each location includes an identifier, e.g., a database record number, a location number, etc.         Each location also includes a unique value for the variable "nid", e.g., for the Parker-Premier location "nid=1002"     </li> <li>A name field: Parker-Premier</li> </ul>
	<ul> <li>A location field including said geographical coordinates: class=\u0022latitude\u0022 title=\u002233.041067\u0022\u003e33° 2\u0027 27.8412\u0022 N\u003c\u002fabbr\u003e, \u003cabbr class=\u0022longitude\u0022 title=\u0022-96.706963\u0022\u003e96° 42\u0027 25.0668\u0022</li> </ul>
	A data field: e.g., address, phone number, ATM functionality/availability, location hours, manager
	The Comerica computer presumably compares the user-entered search criteria to the geographical locations of entries of Comerica locations in a database to identify the Comerica locations geographically closest to the user-entered search criteria.
	The "computer" used by the user to perform this step is the same "computer" used to perform the other steps of this claim.
b. converting said coordinates to an appropriately	Comerica induces a user visiting the Comerica Locator using a "computer" to perform the step of "converting said coordinates to an appropriately proportionate representation on said computer."
proportionate representation on said computer,	The user's computer includes a program (e.g., a browser) which converts computer code received from the Comerica computer into a map according to a predetermined zoom level and predetermined size. For example, the exemplary code below defines the map zoom level and size:
and	{ "autolmap": { "width": "100%", "height": "450px", "zoom": 4, "maxzoom": "14",
	Based on the layout of the Comerica Branch/ATM Locator, the zoom level and size each provide for the display of an appropriately proportionate representation.
	The "computer" used by the user to perform this step is the same "computer" used to perform the other steps of this claim.
c. displaying selectably scalably said items on said computer whereby said user	Comerica induces a user visiting the Comerica Locator using a "computer" to perform the step of "displaying selectably scalably said items on said computer whereby said user may quickly receive and display timely situation information mapped in the context of spatial information, including appropriate to a geographical or other area, in which said mappable hypertext items are quickly received, mapped, and optionally executably selected by said user to provide additional of said situation information or received, stored, and transmitted by a provider of said situation information."
may quickly receive and	The user's computer includes a program (e.g., a browser) that causes the mappable hypertext items that are displayed on a map to appear on

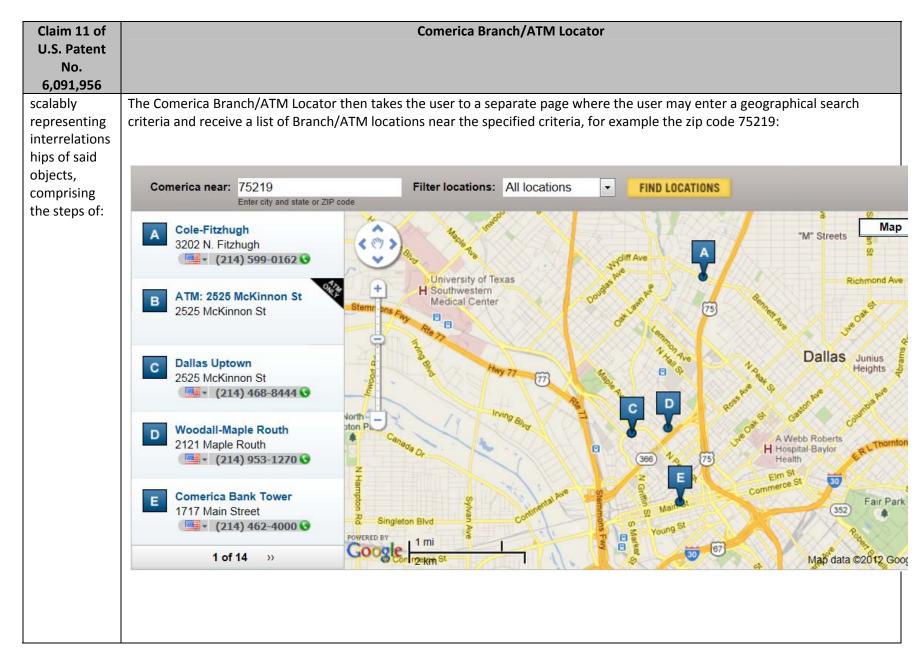
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display timely	the user's computer based on the user-entered search criteria. The scale (or zoom) of the map is initialized to a predetermined value, but a
situation	different scale map be selected by the user. For example, a different scale may be performed by selecting the "+" or "-" symbols displayed on
information	the left side of the map. Selecting the "+" symbol results in zooming in on the displayed map, whereas selecting the "-" symbol results in
mapped in the	zooming out of the displayed map.
context of spatial	
information, including	The map image displays hypertext items corresponding to the user-entered search criteria. Information displayed about places or locations based upon the user-entered search criteria constitutes timely situation information, including, an event, or condition, occurring or about to
appropriate to a	occur at the places or location, such as a place's current address and contact information, the kind of services available at any particular
geographical or	location (e.g., "Full Service," "Drive Through"), an image of the place (e.g., specific branch), and the option to provide directions to the
other area, in	selected location. The locations are geographically relevant (e.g., closest in distance amongst all of the locations) to the user-entered search
which said	criteria. Further, each of the locations is displayed on a map, and are thus, "mapped in the context of spatial information, including
mappable	appropriate to a geographical or other area."
hypertext items	
are quickly	The mappable hyptertext items, e.g., the markers representing the locations, are received, mapped and optionally executable to provide
received,	additional situation information. The markers are received and displayed on the map according to the coordinates associated with each
mapped, and	location. Each marker may also be "optionally executable," when the different tabs such as "ATM", "Hours", and "Manager" are clicked,
optionally	additional situation information (e.g., address, phone number, location type, directions, ATM functionality, ATM availability, location hours,
executably	drive-through hours, manager name and phone number, etc.) is provided. Accordingly, the "additional situation information" is the
selected by said	information displayed in response to clicking tabs or links associated with a given marker.
user to provide	
additional of said	
situation	
information or	
received, stored,	
and transmitted	
by a provider of	
said situation	
information.	

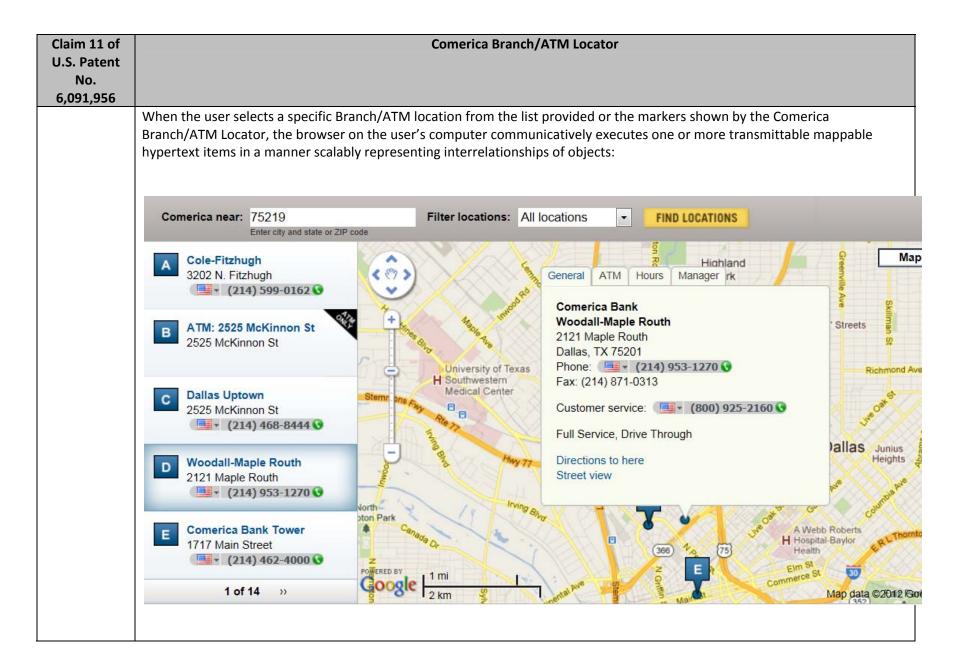


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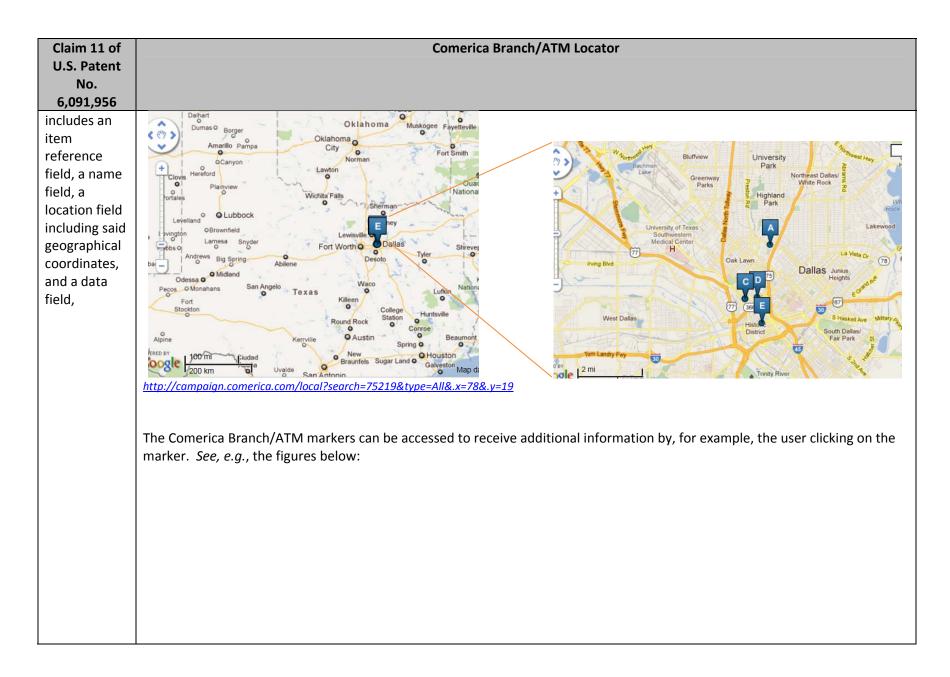
### Comerica Incorporated Infringes U.S. Patent No. 6,091,956 Exhibit C

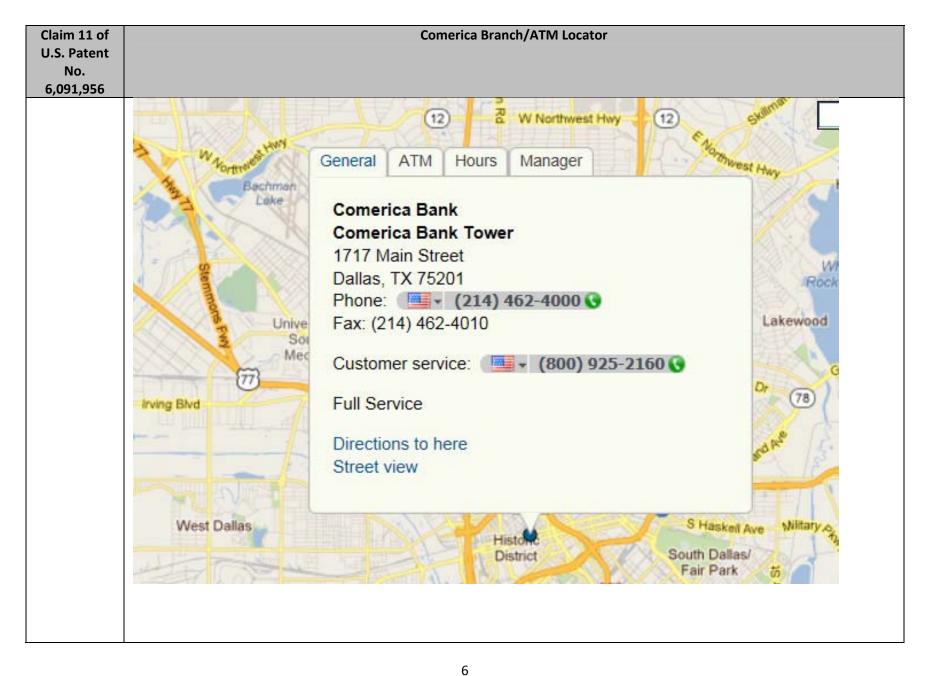






Claim 11 of	Comerica Branch/ATM Locator
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a. searching	Comerica induces website visitors visiting the Comerica Branch/ATM Locator to perform the step of "searching each of one or
each of one	more unique mappable information code sequences, each of which said code sequences serving to uniquely represent one of
or more	said items and copied from the memory of said computer or received from an alternate source, for a field containing
unique	geographical coordinates, said each of said code sequences includes an item reference field, a name field, a location field
mappable	including said geographical coordinates, and a data field."
information	
code	The phrase "mappable hypertext item" is construed to mean "text or one or more symbols, displayable on a map, that can be
sequences,	selected to access additional information."
each of which	
said code	When an end user's browser receives an HTML document from the Comerica Branch/ATM server containing the JavaScript and
sequences	HTML code for the Comerica Branch/ATM Locator, the browser parses and executes the code.
serving to	
uniquely	Executing the code causes the browser to search "each of one or more unique mappable information code sequencesfor a
represent	field containing geographical coordinates."
one of said	
items and	The unique mappable information code sequence, which is received from the Comerica Branch/ATM server – "an alternate
copied from	source" – uniquely, represents a mappable hypertext item, such as a marker representing a Comerica Branch/ATM location, for
the memory	example, as shown below:
of said	
computer or	
received from	
an alternate	
source, for a	
field	
containing	
geographical	
coordinates,	
said each of	
said code	
sequences	





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	The publicly available Comerica Branch/ATM Locator website contains the code sequence that uniquely represents each of the mappable hypertext items and includes a field containing geographical coordinates, such as latitude and longitude information that matches zip codes through the use of geocoding. <i>See, e.g.</i> , the following code excerpt from the publically available Comerica Branch/ATM Locator website:
	"markermode": "1",
	"id": "local_map_large",
	"longitude": "-95.185546875",
	"latitude": "39.30029918615029",
	"markers": [{
	"latitude": 32.816565,
	"longitude": -96.792458,
	<pre>"markername": "comerica", "offset": 0,</pre>
	"text": "\x3cdiv class=\"gmap-popup\"\x3e\x3cdiv class=\"gmap-popup\"\x3e\n
	\x3c!nid:784\x3e\n \x3cdiv class=\"gmap-popup-inner\"\x3e\n \x3cdiv class=
	\"ui-tabs\" style=\"height: 165px;\"\x3e\n \x3cul class=\"ui-tabs-nav\"\x3e\n
	\x3cli class=\"first\"\x3e\x3ca href=\"#general\"\x3eGeneral\x3c/a\x3e\x3c/li\x3e\n
	\x3cli class=\"\"\x3e\x3ca href=\"#atm\"\x3eATM\x3c/a\x3e\x3c/li\x3e\n
	\x3cli class=\"\"\x3e\x3ca href=\"#hours\"\x3eHours\x3c/a\x3e
	"latitude": 32.792111,
	"longitude": -96.805646,
	"markername": "comerica_atm2",
	"offset": 1,

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0,002,000	"text": "\x3cdiv class=\"gmap-popup\"\x3e\x3cdiv class=\"gmap-popup\"\x3e\n \x3c!nid:3079\x3e\n \x3cdiv class=\"gmap-popup-inner\"\x3e\n \x3cdiv class=\"ui-tabs\" style=\"height: 165px;\"\x3e\n \x3cul class=\"ui-tabs-nav\"\x3e\n \x3cli class=\"first\"\x3e\x3c href= \"#general\"\x3eGeneral\x3c/a\x3e\x3c/li\x3e\n \x3cli class=\"\"\x3e\x3ca href=\"#atm\"\x3eATM\x3c/a\x3e\x3c/li\x3e\n \x3c/ul\x3e\n \x3cdiv id=\"general\"\x3e\n
	Each of the code sequences includes an item reference field, a name field, a location field including the geographical coordinates, and a data field. See, e.g., the following:  "markers": [{     "latitude": 32.816565,
	"opts": {     "title": "",     "highlight": 0,     "highlightcolor": "#FF0000" },     "nid": "784"

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	The browser searches the code sequence associated with each marker shown above for geographical coordinates by, for
	example, executing the code associated with the functions "Drupal.gmap.addHandler ('gmap', function (elem) {}" and
	"Drupal.gmap.factory.marker". See, e.g., the following code excerpts:
	Drupal.gmap.addHandler('gmap', function (elem) {
	var obj = this;
	obj.bind('init', function () {
	if (obj.vars.behavior.autozoom) {
	obj.bounds = new GLatLngBounds();
	}
	<pre>});</pre>
	obj.bind('addmarker', function (marker) {
	var m = Drupal.gmap.factory.marker(new
	GLatLng(marker.latitude, marker.longitude), marker.opts);
	<pre>marker.marker = m;</pre>
	GEvent.addListener(m, 'click', function () {
	obj.change('clickmarker', -1, marker);
	<pre>});</pre>
	Drupal.gmap.factory.marker = function (loc, opts)
	{
	·
	return new GMarker(loc, opts);
	};

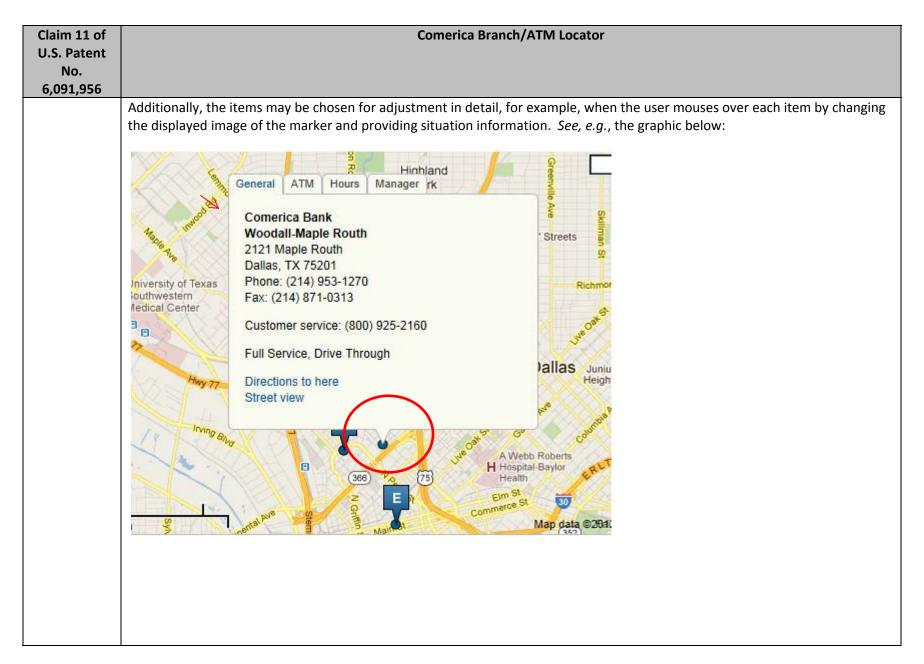
Claim 11 of U.S. Patent No. 6,091,956	Comerica Branch/ATM Locator
b. converting said coordinates to an appropriately proportionat e representation on said computer, and	Comerica induces website visitors visiting the Comerica Branch/ATM Locator to perform the step of "converting said coordinates to an appropriately proportionate representation on said computer."  The browser on the user's computer converts each geographical coordinate identified to an appropriately proportionate representation on the user's computer by creating each mappable hypertext item, for example by executing the code associated with the function "Drupal.gmap.factory.marker". The latitude and longitude geographical coordinates that are searched and identified for each mappable information code sequence are used in creating each marker. The Comerica Branch/ATM Store Locator identifies these geographical coordinates as variables "marker.latitude" and "marker.longitude," which it uses for creating each marker. See, e.g., the following code excerpt:  Drupal.gmap.addHandler('gmap', function (elem) {     var obj = this;      obj.bind('init', function () {         if (obj.vars.behavior.autozoom) {             obj.bounds = new GLatIngBounds();         }       });      obj.bind('addmarker', function (marker) {         var m = Drupal.gmap.factory.marker(new GLatIng(marker.latitude, marker.longitude), marker.opts);       marker.marker = m;       GEvent.addListener(m, 'click', function () {             obj.change('clickmarker', -1, marker);       });  Drupal.gmap.factory.marker = function (loc, opts) {             return new GMarker(loc, opts);       }

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3,003,000	The browser converts the latitude and longitude geographic coordinates to an appropriate proportionate representation for each marker on the user's computer using standard function, "obj.map.getBoundsZoomLevel ()" and "obj.map.setCenter()," in Google's API. See, e.g., the following:
	<pre>Drupal.gmap.addHandler('gmap', function (elem) {</pre>
	<pre>obj.bind('markersready', function () {</pre>
	<pre>// If we are autozooming, set the map center at this time. if (obj.vars.behavior.autozoom) {</pre>
	<pre>if (!obj.bounds.isEmpty()) {</pre>
	<pre>obj.map.setCenter(obj.bounds.getCenter(), Math.min   (obj.map.getBoundsZoomLevel(obj.bounds), obj.vars.maxzoom)); }</pre>
	<pre>});</pre>

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	if (obj.vars.behavior.autozoom)
	{
	<pre>obj.bounds.extend(marker.marker.getPoint());</pre>
	}
	// If the highlight arg option is used in views highlight the marker.
	<pre>if (marker.opts.highlight == 1)</pre>
	{
	ו highlightMarker(obj.map, marker, 'viewHighlight',
	marker.opts.highlightcolor);
	}
	Constitution of the Consti
c. displaying	Comerica induces website visitors visiting the Comerica Branch/ATM Locator to perform the step of "displaying selectably
selectably scalably said	scalably said items on said computer whereby said user may quickly receive and display timely situation information mapped in the context of spatial information, including appropriate to a geographical or other area, in which said mappable hypertext
items on said	items are quickly received, mapped, and optionally executably selected by said user to provide additional of said situation
computer	information or received, stored, and transmitted by a provider of said situation information."
whereby said	
user may	The Court has construed this step in the following manner:
quickly	·
receive and	"displaying selectably scalably said items on said computer,
display timely	
situation	whereby said user may, quickly, receive and display timely situation information mapped in the context of spatial information,
information	including spatial information appropriate to a geographical or other area, and
mapped in	
the context	whereby said mappable hypertext items are, quickly, either:
of spatial	(1) received, mapped, and optionally executably selected by said user to provide additional of said situation information; or
information, including	(2) received by a provider of said situation information, stored by a provider of said situation information, and transmitted by a provider of said situation information"
appropriate	The term "displaying" is construed to mean "said computer causing to appear."
appropriate	The term displaying is constitued to mean said computer causing to appear.

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to a geographical	The browser causes the mappable hypertext items to appear on the user's computer selectably scalably by executing the code
or other area,	for the function "Drupal gmap addHandler('gmap', function (elem) {})." See, e.q, the following:
in which said	
mappable	
hypertext	// Map widget // //////////////////////////////////
items are	Drupal.gmap.addHandler('gmap', function (elem) {
quickly	<pre>var obj = this;</pre>
received, mapped, and	<pre>var _ib = {};</pre>
optionally	
executably	<pre>jQuery.extend(Drupal.settings, { "basePath": "/",</pre>
selected by	<pre>"accenture_ado": { "workspace": "", "preview": false, "levels": [ ] }, "colorbox": { "transition": "elastic",</pre>
said user to	"speed": 350, "opacity": "0.85", "slideshow": false,
provide	"slideshowAuto": false, "slideshowSpeed": 2500,
additional of	"slideshowStart": "", "slideshowStop": "", "current": "
said situation	{current} of {total}", "previous": "« Prev", "next": "Next
information	<pre>»", "close": "Close", "overlayClose": true, "maxWidth": "100%", "maxHeight": "100%" }, "baseUrl":</pre>
or received, stored, and	
transmitted	<pre><div class="view-inner-attachment 1"></div></pre>
by a provider	<pre><div class="view-content"></div></pre>
of said	<pre><div class="gmap-control gmap-gmap gmap&lt;/td&gt;&lt;/tr&gt;&lt;tr&gt;&lt;td&gt;information.&lt;/td&gt;&lt;td&gt;&lt;pre&gt;gmap-map gmap-local_map_large-gmap" id="gmap-&lt;/pre&gt;&lt;/td&gt;&lt;/tr&gt;&lt;tr&gt;&lt;td&gt;situation&lt;/td&gt;&lt;td&gt;local_map_large-gmap0" style="width: 100%; height: 386px;">Please be patient as the Comerica banking center map loads. This map requires</div></pre>
	JavaScript. Please ensure JavaScript is enabled within your
	browser.
	The phrase "selectably scalably" means "capable of being chosen for adjustment in size or detail." The specification teaches, for

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	example, that "[a]II the aforementioned items are displayed according to their geographic locations in the scale of the area to be viewed on the display, which area to be viewed is selectable and may be zoomed in or out" Col. 22:51-55.
	The scale (or zoom) of the map is initialized to a predetermined value but a different scale map may be selected by the user. For example, a different scale may be performed by selecting the "+" or "-" symbols displayed on the left side of the map. Selecting the "+" symbol results in zooming in on the displayed map, whereas selecting the "-" symbol results in zooming out of the displayed map, as shown below:
	The Streets  A  University of Texas H Suthwestern Medical Center  Zoom In IP  John P  John P



```
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              See, also, the sample publically available code excerpt:
              Map widget
              Drupal.gmap.addHandler('gmap', function (elem) {
                var obj = this;
                var _ib = {};
                // Respond to incoming zooms
                ib.zoom = obj.bind("zoom", function () {
                  obj.map.setZoom(obj.vars.zoom);
                });
                // Respond to incoming moves
                ib.move = obj.bind("move", function () {
                  obj.map.panTo(new GLatLng(obj.vars.latitude,
              obj.vars.longitude));
                });
                // Respond to incoming map type changes
                _ib.mtc = obj.bind("maptypechange", function () {
                  for (i = 0; i < obj.opts.mapTypeNames.length; i++) {
                    if (obj.opts.mapTypeNames[i] === obj.vars.maptype) {
                      obj.map.setMapType(obj.opts.mapTypes[i]);
                      break;
                  }
                });
                // Respond to incoming width changes.
                ib.width = obj.bind("widthchange", function (w) {
                  obj.map.getContainer().style.width = w;
                  obj.map.checkResize();
                });
                // Send out outgoing width changes.
                // N/A
                // Respond to incoming height changes.
                _ib.height = obj.bind("heightchange", function (h) {
                  obj.map.getContainer().style.height = h;
                  obj.map.checkResize();
                // Send out outgoing height changes.
                // N/A
```

Claim 11 of U.S. Patent No. 6,091,956	Comerica Branch/ATM Locator
0,091,930	The mappable hypertext items are displayed such that the "user may, quickly, receive and display timely situation information mapped in the context of spatial information, including spatial information appropriate to a geographical or other area."
	The Court has construed the term "timely situation information" to mean "timely information about an event, or a condition, occurring or about to occur at a place."
	The Comerica Branch/ATM Locator provides timely situation information, including an event, or condition, occurring or about to occur at the places or locations displayed on the user's computer, such as a place's current address, contact information, customer service information, the location of a place, the kind of services available at any particular location (e.g., "Full Service," "Drive Through"), an image of the place (e.g., the branch location), and the option to provide directions to the selected location. The locations are geographically relevant (e.g., closest in distance amongst all of the locations) to the user-entered search criteria. Further, each of the locations is displayed on a map, and are thus, "mapped in the context of spatial information, including appropriate to a geographical or other area."  See, e.g., the following:

```
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              // Default marker actions.
              obj.bind('clickmarker', function (marker)
              {
                  // Local/stored content
                  if (marker.text)
                  {
                      marker.marker.openInfoWindowHtml(marker.text);
                  // AJAX content
                  if (marker.rmt)
                      var uri = marker.rmt;
                      // If there was a callback, prefix that.
                      // (If there wasn't, marker.rmt was the FULL path.)
                      if (obj.vars.rmtcallback)
                          uri = obj.vars.rmtcallback + '/' + marker.rmt;
```

```
Claim 11 of
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                 $.get(uri, {}, function (data)
                     marker.marker.openInfoWindowHtml(data);
                 });
             }
             // Tabbed content
             else if (marker.tabs)
                 var infoWinTabs = [];
                 for (var m in marker.tabs)
                     if (marker.tabs.hasOwnProperty(m))
                          {
                              infoWinTabs.push(new GInfoWindowTab(m, marker.tabs[m]));
                     marker.marker.openInfoWindowTabsHtml(infoWinTabs);
                 // No content -- marker is a link
                 else if (marker.link)
                     open(marker.link, '_self');
             });
```

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	<pre>obj.bind('markersready', function () {     // If we are autozooming, set the map center at this time.     if (obj.vars.behavior.autozoom)     {         if (!obj.bounds.isEmpty())           {             obj.map.setCenter(obj.bounds.getCenter(), Math.min</pre>

```
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              Drupal.gmap.addHandler('gmap', function (elem)
                  var obj = this;
                  obj.bind('addmarker', function (marker)
                      obj.map.addOverlay(marker.marker);
                  });
                  obj.bind('delmarker', function (marker)
                      obj.map.removeOverlay(marker.marker);
                  });
                  obj.bind('clearmarkers', function ()
                      // @@@ Maybe don't nuke ALL overlays?
                      obj.map.clearOverlays();
                  });
              });
             See also, the displayed situation information:
```

